

ARCHER & GREINER, P.C.
1025 Laurel Oak Road
Voorhees, NJ 08043
Tel. (856) 795-2121
By: John J. McDermott, Esq.
(jmcdermott@archerlaw.com)

GIBBS & BRUNS, LLP
1100 Louisiana Street, Suite 5300
Houston, TX 77002
Tel. (713) 650-8805
By: Kathy D. Patrick, Esq.
(kpatrick@gibbsbruns.com)
Anthony N. Kaim, Esq.

Attorneys for Plaintiff Occidental Chemical Corporation

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

OCCIDENTAL CHEMICAL CORPORATION)	Hon. Madeline Cox Arleo
)	Hon. Leda Dunn Wettre
Plaintiff,)	
)	Civil Action No. 2:18-cv-11273
v.)	
)	
21ST CENTURY FOX AMERICA, INC., <i>et al.</i>)	NOTICE OF PLAINTIFF
)	OCCIDENTAL CHEMICAL
Defendants and Third-Party Plaintiffs,)	CORPORATION'S CROSS-
)	MOTION FOR PROTECTIVE
v.)	ORDER
)	
PASSAIC VALLEY SEWERAGE)	
COMMISSIONERS, <i>et al.</i>)	
)	
Third-Party Defendants.)	
)	

PLEASE TAKE NOTICE that Plaintiff Occidental Chemical Corporation (“OxyChem”) cross-moves before Special Master Thomas P. Scrivo for a protective order pursuant to Local Civil Rule 7.1(h) and Federal Rule of Civil Procedure 26(c) regarding Request for Admissions

served by the Defendants in the Small Parties Group (the “Motion”), and respectfully requests that the Special Master order:

- (1) that OxyChem is relieved from any further duty, under Fed. R. Civ. P. 26(e), to provide any further response to the 449 requests for admission served by the Small Parties Group (“SPG”) on July 13, 2021; *and*
- (2) that the SPG Defendants, individually or collectively, may not serve any further requests for admission on OxyChem.

In support of the Motion, OxyChem relies on the following: OxyChem’s Brief in Support of Cross-Motion for Protective Order and Opposition to the Small Parties Group’s Motion for a Determination of the Sufficiency of Amended Responses to Requests for Admission; Certification of John J. McDermott, Esq. with exhibits; and Affidavit of Compliance with Local Civil Rule 37.1.

A proposed form of order is attached for the Court’s consideration.

Respectfully submitted,

Dated: February 24, 2022

/s/ John J. McDermott
John J. McDermott, Esq.
(jmcdermott@archerlaw.com)
ARCHER & GREINER, P.C.
1025 Laurel Oak Road
Voorhees, NJ 08043
Tel. (856) 795-2121

GIBBS & BRUNS, LLP
1100 Louisiana Street, Suite 5300
Houston, TX 77002
Tel. (713) 650-8805
By: Kathy D. Patrick, Esq.
(kpatrick@gibbsbruns.com)
Anthony N. Kaim, Esq.

Attorneys for Plaintiff Occidental Chemical Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Notice of Plaintiff Occidental Chemical Corporation's Cross-Motion for Protective Order and Opposition to the Small Parties Group's Motion for a Determination of the Sufficiency of Amended Responses to Requests for Admission was served on all counsel of record via electronic filing.

Dated: February 24, 2022

/s/ John J. McDermott
John J. McDermott, Esq.